

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

ANDREY BUYNOVSKIY)

) Criminal Action No.: 02-30043-MAP

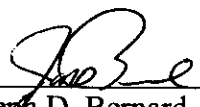
MOTION FOR DOWNWARD DEPARTURE

Now comes, Andrey Buynovskiy, in the above-entitled matter and respectfully moves this Honorable Court for a Downward Departure. In support thereof, Mr. Buynovskiy states that such a downward departure is warranted for the following reasons:

1. The Defendant had "minimal participation" in the concerted activity and is entitled to a total reduction of four (4) levels pursuant to §3B1.2, as opposed to the two (2) levels proposed in the Pre-Sentence Report;
2. Mitigating Circumstances not adequately taken into consideration by the U.S.S.G. pursuant to §5K2.0; and
3. Family Ties and Responsibilities pursuant to §5H1.6

A Memorandum of Law is attached in support of the following motion.

Respectfully Submitted,
Andrey Buynovskiy
By His Attorney:



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